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August 28, 2024

Via ECF & email

The Honorable Richard M. Berman
United States District Court
Southern District of New York
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Re: *United States v. William Hill*, No. 24 Cr. 00082 (RMB)

Dear Judge Berman:

I represent William Hill in the above-captioned matter and respectfully request that the Court modify the conditions of his bond to permit travel from his home in Lisbon, Portugal to the Southern District of New York in the company of his Portuguese counsel.

Under the current conditions of Mr. Hill's bond, he is permitted to travel between Portugal and the Southern District for court appearances and to meet with his Pretrial Services officer while accompanied by defense counsel from my firm. To save resources, I respectfully request that the Court modify this condition to permit such travel while Mr. Hill is accompanied by his Portuguese counsel, Jéssica Barbosa Martins, an attorney at Carlos Pinto de Abreu e Associados, a respected firm that has worked closely with Dechert LLP since the start of this matter as well as on other, prior matters.

I have provided Ms. Barbosa Martin's firm biography and proof of standing as a licensed Portuguese lawyer to AUSAs Andrew Chan and David Felton. They have no objection to the requested modification.

I have also informed Mr. Hill's Pretrial Services Officer Jessica Aguilar-Adan of the request and she too has no objection.

Respectfully submitted,

/s/ Roger A. Burlingame

Roger A. Burlingame

cc: AUSAs Andrew Chan & David Felton (via ECF)
Officer Jessica Aguilar-Adan, Pretrial Services (via Email)